



February 11, 2015

VIA ECF

The Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

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Re: *XL Specialty Insurance Company v. Lakian, et al.*
Civil Action No. 14-cv-5225

Dear Judge Torres:

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We represent John Lakian and Diane Lamm in the above captioned matter. We write regarding the upcoming February 12, 2015 deadline to file an answer. We requested the parties consent to a "last and final" three-week extension of the time to answer in order to continue attempts to resolve this issue without additional litigation. Although XL and Merrill consented to the extension, Kobre & Kim LLP and Eiseman Levine Lehrhaupt & Kakoyiannis P.C. did not. Accordingly, we will file our answer in time for the February 12, 2015 deadline, and we expect those parties who objected the extension to also file by the deadline. Eiseman Levine Lehrhaupt & Kakoyiannis P.C. has already filed. (Dkt. 72.)

However, we respectfully request this Court grant the extension as to the other parties in the hope of potentially sparing them unnecessary legal fees while the parties continue to work towards resolution. No party can legitimately claim that a three-week extension will cause prejudice, particularly where the extension may facilitate resolution of this matter.

We appreciate the Court's patience. This will be the final request for an extension.

Respectfully submitted,

/s Brian J. Osias

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BJO/jm

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